

### REMARKS/ARGUMENTS

Claims 1-24 are pending in this application. The Office Action, dated March 22, 2006, rejected claims 1-24, objected to claims 1, 12, and 19, and objected to the specification. The specification was amended in view of the invention. No new matter has been added by this amendment.

#### The Specification

Applicants have checked the status of related matters and found them to be pending. Accordingly, no update is required at this time.

The specification was objected to under 37 CFR 1.96(c) because the description contained a listing of more than 300 lines. The specification has been amended to include by reference a CD that comprises a listing. No new matter has been added.

#### Claim Rejections – 35 USC § 102(a)

Claims 1-24 stand rejected under 35 USC 102 (a) as being anticipated by Altova Inc. & Altova GmbH, “XML Spy 4.0 Manual,” copyright 1998-2001, September 10, 2001, downloaded by the Examiner from [http://www.altova.com/download\\_archive.html](http://www.altova.com/download_archive.html) and link, pages 18-286 (“XML Spy”). Regarding claim 1, XML Spy fails to teach or suggest a third component that is arranged to validate the word-processor document, wherein the validation selectively ignores mixed content within the word-processor document. Instead, XML Spy merely shows a “grid fonts” tab that allows customizing the appearance of text in the Enhance Grid view and “Schema/Text” tabs that allows customizing the appearance of text in the Text view.

The screen shot of the window for the Grid font tab (and supporting text) show that the customization applies to “types” of code such as “Element Names,” “Element Namespaces,” “Attribute Names,” “Attribute namespaces,” “Attribute previews,” and the like. Accordingly, the customization applies only to identifying anything that matches a category in the list, and does not associate a custom font (or the like) with a particular element, for example. This distinction is significant because the customization is not “in-lined” with the code for an element, and thus does not constitute “mixed content” for an element of an XML document to be validated. Furthermore, the Grid font tab only applies to the “appearance” of the text, and is not used in validation.

Likewise, the screen shot of the window for the Schema font tab (and supporting text) show that the customization applies to categories such as “Group Name,” “Sub-line Title,” “Sub-line Content,” “Min/Max,” “Annotation,” and the like. Accordingly, the customization applies only to identifying anything that matches a category in the list, and does not associate a custom font (or the like) with a particular element, for example. Again, the customization is not “in-lined” with the code for an element, and thus does not constitute “mixed content” for an element of an XML document to be validated. Furthermore, the Text font tab only applies to the “appearance” of the text, and is not used in validation.

The Text font tab screenshot and supporting text similarly show associations of categories of text with font options. Again, the categories are not specific to particular elements of XML and lack validation of mixed content.

The Encoding tab is used to specify the kind of character-set encoding to be used for files, and thus is not specific to particular elements of XML. The encoding is used to produce documents, rather than validate them.

XML Spy is alleged to teach that complex types are de-selectable from the document. Firstly, the “document” is an automatically generated document describing the schema, (and not the document to be validated). Furthermore, although complex types allow for hierarchical definitions, the example complex types do not show the text that is necessary for having mixed content. As noted in the specification at page 2, lines 1-2, “[M]ixed content occurs when sibling nodes of an element contain different types of content.” Again, the de-selectable types of the cited art are not specific to particular elements of an XML document and instead apply only to broad categories. Accordingly, XML Spy does not teach or fairly suggest validation that selectively ignores mixed content within the word-processor document. Claim 1 is thus submitted to be allowable.

Claims 2-3 depend from claim 1 and are submitted to be allowable for at least the reasons submitted above for claim 1. Moreover, the complex types of XML Spy apply only to broad categories and do not teach or fairly suggest validation that selectively ignores mixed content within the word-processor document.

Claim 4 is submitted to be allowable for at least the reasons submitted above for claim 1. Moreover, the complex types of XML Spy apply only to broad categories and do not teach or fairly suggest validation that selectively ignores mixed content comprising an image within the word-processor document.

Claim 5 is submitted to be allowable for at least the reasons submitted above for claim 1. Moreover, the save function of XML Spy applies to saving files and does not teach or fairly suggest validation that selectively ignores mixed content within the word-processor document.

Claim 6 is submitted to be allowable for at least the reasons submitted above for claim 5. Moreover, the fonts function of XML Spy applies to selecting fonts for schema (for example) and does not teach or fairly suggest validation that selectively suppresses mixed content within the word-processor document.

Claim 7 is submitted to be allowable for at least the reasons submitted above for claim 1. In particular, the validation function of XML Spy applies only generally to updating a schema definition and revalidating a document in view of the redefinition of the schema. Accordingly, XML Spy does not teach or fairly suggest validation that selectively ignores mixed content within the word-processor document.

Claim 8 is submitted to be allowable for at least the reasons submitted above for claim 1. Moreover, the edit functions of XML Spy applies generally to editing files and does not teach or fairly suggest validation that selectively ignores mixed content within the word-processor document.

Claim 9 is submitted to be allowable for at least the reasons submitted above for claim 1. In particular, the fonts function of XML Spy applies to selecting fonts for schema. Again, the selected fonts apply to general categories for displaying schema and does not teach or fairly

suggest validation that selectively suppresses mixed content within the word-processor document in response to a user input.

Claim 10 is submitted to be allowable for at least the reasons submitted above for claim 1. Moreover, the use of default fonts with XML Spy applies to the type of originating document and does not teach or fairly suggest validation that selectively ignores mixed content within the word-processor document in response to environmental variables.

Claim 11 is submitted to be allowable for at least the reasons submitted above for claim 1. Moreover, the edit functions of XML Spy applies generally to editing files using XML-text and does not teach or fairly suggest validation that selectively ignores mixed content within the word-processor document in response to a declaration in the word-processing document.

Claim 12 was rejected under the same rationale as stated above for claim 1. XML Spy fails to teach or suggest determining whether mixed content within the word-processing document is to be ignored, and parsing and validating the word-processing document such that mixed content does not cause validation errors when the determination has been made that mixed content within the word-processing document is to be ignored. As discussed above with reference to claim 1, XML Spy does not teach or fairly suggest validation that selectively ignores mixed content within the word-processor document. Claim 12 is thus submitted to be allowable.

Claim 13 was rejected under the same rationale as claim 1. Claim 13 depends from claim 12 and is submitted to be allowable for at least the reasons submitted above for claim 12.

Claim 14 is submitted to be allowable for at least the reasons submitted above for claim 12. Moreover, the editing tab of XML Spy (p. 167) applies generally to defining the behavior of the Enhanced Grid View XML-text when exchanging data using the clipboard and the “drag and drop” command. Although XML is written during these operations, the operations do not teach or fairly suggest validation that selectively ignores mixed content within the word-processor document according to the instructions contained within the XML file itself, for example.

Claim 15 was rejected under the same rationale as claim 5 and is submitted to be allowable for at least the reasons submitted above for claim 5.

Claim 16 is submitted to be allowable for at least the reasons submitted above for claim 15. Moreover, the save mechanism of XML Spy (p. 186) applies generally to saving the content model (which is a graphical representation) of the displayed window. No validation appears to be suggested or taught. The save applies to generating a description of schema and does not teach or fairly suggest not validating mixed content when a determination has been made that mixed content is to be ignored.

Claim 17 is submitted to be allowable for at least the reasons submitted above for claim 12. Moreover, the graphical user interface of XML Spy applies to generating a description of schema and does not teach or fairly suggest not validating mixed content when a determination has been made that mixed content is to be ignored.

Claim 18 is submitted to be allowable for at least the reasons submitted above for claim 12. Moreover, the display of (re)validation errors of XML Spy applies generally to updating a

schema definition and revalidating a document in view of the redefinition of the schema. Thus, the display of (re)validation errors of XML Spy does not teach or fairly suggest not validating mixed content when a determination has been made that mixed content is to be ignored.

Claim 19 was rejected under the same rationale as stated above for claim 1. XML Spy fails to teach or suggest a validation engine configured to validate the ML file, wherein the validation engine selectively validates mixed content. As discussed above with reference to claim 1, XML Spy does not teach or fairly suggest validation that selectively ignores mixed content within the word-processor document. Claim 19 is thus submitted to be allowable.

Claim 20 was rejected under the same rationale as claims 17 and 18 and is submitted to be allowable for at least the reasons submitted above for claims 17 and 18.

Claim 21 is submitted to be allowable for at least the reasons submitted above for claim 19. In particular, the display of validation errors of XML Spy applies generally to updating a schema definition and revalidating a document in view of the redefinition of the schema. Thus, the display of validation errors of XML Spy does not teach or fairly suggest not validating mixed content when a determination has been made that mixed content is to be ignored.

Claim 22 is submitted to be allowable for at least the reasons submitted above for claim 19. Moreover, the opening for editing functions of XML Spy applies to defining the behavior of the Enhanced Grid view, when exchanging data using the clipboard and moving items with a drag and drop. There is no teaching or suggestion for displaying mixed content.

Claim 23 was rejected under the same rationale as claim 5 and is submitted to be allowable for at least the reasons submitted above for claim 5.

Claim 24 is submitted to be allowable for at least the reasons submitted above for claim 21. Moreover, the display of validation errors of XML Spy applies generally to updating a schema definition and revalidating a document in view of the redefinition of the schema. Thus XML Spy does not teach or suggest displaying validation errors in validated mixed content.

Accordingly, claims 1-24 are submitted to be patentable at least for the reasons stated above. All dependent claims are submitted to be patentable for at least the reasons that the claims from which they depend are allowable.

In view of the foregoing amendments and remarks, all pending claims are believed to be allowable and the application is in condition for allowance. Therefore, a Notice of Allowance is respectfully requested. Should the Examiner have any further issues regarding this application, the Examiner is requested to contact the undersigned attorney for the applicants at the telephone number provided below.

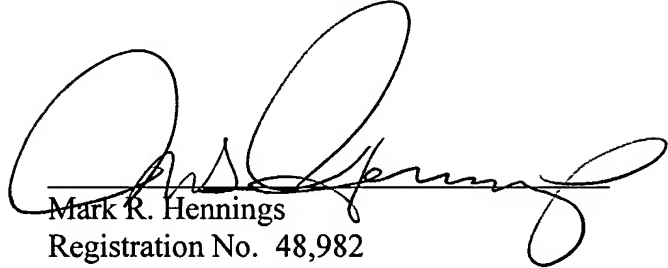


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Respectfully submitted,

MERCHANT & GOULD P.C.

A handwritten signature in black ink, appearing to read "Mark R. Hennings", written over a horizontal line.

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